

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK TIMES COMPANY,	:	
	:	No. 1:23-cv-11195-SHS
Plaintiff,	:	
	:	No. 1:24-cv-03285-SHS
v.	:	
	:	
MICROSOFT CORPORATION, OPENAI,	:	
INC., OPENAI LP, OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPCO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, and OPENAI	:	
HOLDINGS, LLC,	:	
	:	
Defendants.		

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DAILY NEWS, LP; CHICAGO TRIBUNE	:
COMPANY, LLC; ORLANDO SENTINEL	:
COMMUNICATIONS COMPANY, LLC;	:
SUN-SENTINEL COMPANY, LLC; SAN	:
JOSE MERCURY-NEWS, LLC; DP MEDIA	:
NETWORK, LLC; ORB PUBLISHING, LLC;	:
AND NORTHWEST PUBLICATIONS, LLC,	:
Plaintiffs	:
	X

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Carolyn Homer hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI

LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OPCO LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.

I am in good standing with the bar of Washington, D.C. and the state of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: October 25, 2024

RESPECTFULLY SUBMITTED,

/s/ Carolyn Homer

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OPENAI, INC., OPENAI LP, OPENAI
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OPCO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, and
OPENAI HOLDINGS, LLC